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May 16, 2016

VIA ECF

Honorable Susan D. Wigenton, U.S.D.J.
United States District Court for the District of New Jersey
50 Walnut Street
Newark, New Jersey 07101

Re: North Jersey Media Group Inc., et al. v. United States of America, et al.
Civil Action No.: 2:16-cv-00267-SDW
Criminal No: 2:15-cr-193-SDW

Dear Judge Wigenton:

This firm represents Media Intervenor in the above-referenced action. As the Court knows, unindicted coconspirator John Doe has challenged this Court's Denial of a Stay Order to the Third Circuit. That stay application has been briefed and we are awaiting word from the Circuit.

Because John Doe's counsel, Jenny Kramer of Chadbourne & Parke LLP, has expressly stated she represents only John Doe, we write to respectfully request that in the event that the Third Circuit agrees to grant a stay, or if the Court's Order of May 13, 2016 is delayed in any other way, that this Court order release of the Conspirator Letter as scheduled with John Doe's name redacted.

In order to facilitate this, we would respectfully request the Court seek from Ms. Kramer the name of her client *in camera* and either instruct the U.S. Attorney to redact that name, or perhaps the Court could do so itself. We would submit that in the event of a stay there should be nothing that prevents release of the Conspirator List less John Doe's real name, and in our papers today we have asked the Third Circuit to draft its order narrowly in the event a stay is granted to allow for release of the balance of the letter. See Footnote 1 of Media Intervenor's Brief to Third Circuit.

Respectfully submitted,

/s/ Bruce S. Rosen

Bruce S. Rosen

BSR/ckc

cc: All counsel of Record